

**ENGINEERING STATEMENT**  
**In Support of a**  
**COUNTERPROPOSAL – MM Docket 98-198; RM-9304**  
**First Broadcasting Management, LLC**  
**Gain-Air Company, Inc.**  
**KCYT-FM License Corporation**

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# ENGINEERING STATEMENT

In Support of a

## COUNTERPROPOSAL MM Docket 98-198; RM-9304 First Broadcasting Management, LLC

### SUMMARY OF CHANNEL ASSIGNMENTS

[DEPICTING ALL COMMUNITIES, CHANNELS & MODIFICATIONS]

<u>COMMUNITY</u>	<u>PRESENT</u>	<u>PROPOSED</u>	<u>COMMENTS</u>
Muenster, TX	293A	294C	Channel, site, and class change.
Granbury, TX	294C, KPAR (AM)	KPAR (AM)	Community of license, channel, class and site change.
Benbrook, TX	-----	296C1	Community of license, channel, class and site change.
Graham, TX	296A, (296C3)	234C3	Channel and site change.
Waco, TX	233A, 238C, 248C, 260C, 296A	233A, 238C, 248C, 260C, 277A	Channel change only.
Clifton, TX	277C3	281C3	Channel change only.
Brownwood, TX	207A, 212A, 219A, 257C2, 268C1, 281C1	207A, 212A, 219A, 257C2, 268C1, 245C1	Channel change only.
Cross Plains, TX	245C3	290C3	Channel change only.
San Saba, TX	246A	291A	Channel change only.
Terrell, TX	296A, KPYK(AM)	KPYK(AM)	Community of license change.
Mason, TX	291A	259A	Channel change only.
Coleman, TX	296C3	272C3	Channel change only.
Kerens, TX	-----	295A	Channel, community of license, and site change.
Lone Grove, OK	294A	296C3	Channel, class, and site change.
Lawton, OK	207A, 212A, 216C2, 231C2, 237C3, 267C1, 297C2	207A, 212A, 216C2, 231C2, 237C3, 267C1, 297C2	Site change only.
Madill, OK	273A	273C2	Community of License and classification change.
Durant, OK	296A (296C3)	292A (292C3)	Class A channel change only, class C3 site and channel change.
McKinney, TX	295A	201C1 (KNTU)	Community of license, channel and site change.
Campbell, TX	-----	296A	Community of license, channel and site change.
Detroit, TX	294C2 (proposed)	238C2 or 282C2	Channel and site change.
Hugo, OK	238C2, 294C2 (proposed)	282C2	Channel change only.
Antlers, OK	222C2, 284A	222C2, 262A	Channel and site change.
Clinton, OK	238C2, 295C1	238C2, 294C1	Channel and site change.

TABLE 1

**Engineering Statement**  
**In Support of a**  
**Counterproposal**  
**MM Docket 98-198; RM-9304**  
**First Broadcasting Management, LLC**  
**Gain-Air Company, Inc.**  
**KCYT-FM License Corporation**

**General**

The instant Counterproposal was prepared for First Broadcasting Management LLC, Gain-Air Company and KCYT-FM License Corporation. The counterproponents will be referred to collectively as First Broadcasting Management, LLC (First Broadcasting). It is prepared and submitted as a Counterproposal to MM Docket 98-198; RM-9304. In the NPRM (DA 98-2188) the petitioner, ALALATEX Broadcasters, proposes the allotment of channel 245C3 at Cross Plains, Texas. This allotment is in conflict with the First Broadcasting proposed use of channel 245C1 at Brownwood, Texas. Therefore, the instant Counterproposal is mutually exclusive (MX) with the ALALATEX petition. However, First Broadcasting proposes the allotment of substitute channel 290C3 in lieu of channel 245C3 at Cross Plains.

The instant Counterproposal proposes to delete channel 293A at Muenster, Texas and substitute Channel 294C. It also proposes that the license of KXGM be modified accordingly. In addition the Counterproposal requests the downgrade of KDXT, Channel 294C at Granbury, Texas, the allotment of channel 296C1, and a change in community of license to Benbrook, Texas. It requests the license of KDXT be modified accordingly. The Counterproposal also seeks an upgrade of KYNZ, channel 294A, Lone Grove,

Oklahoma to channel 296C3. It requests the modification of the KYNZ license to reflect this upgrade.

If the Commission adopts the First Broadcasting Counterproposal as submitted, all parties can receive their requested facility changes.

## **METHODS**

The First Broadcasting Counterproposal is presented in sections, with each channel or license facility where a change is proposed discussed individually. All sections begin with an allocation or channel spacing study. Additional exhibits then support the proposed modification's technical compliance.

All searches were performed on a V-Soft SearchFM program and verified with the EDX FMSR Search program. The FCC F(50,50) contours were calculated using Soft Wright's Terrain- Analysis Package (TAP) Version 4.00.282. The studies were based on the latest technical data from the Commission's databases. A professional mapping program from MapInfo Corporation, Version 5.0 conducted mapping, population counts, and gain/loss areas. The program contains the exact community boundaries of the relevant cities. In pertinent cases where community boundaries are critical, the boundaries were cross-checked with the U.S. Census Bureau's TIGER maps. In addition one study has an enlargement of the community boundaries at their farthestmost point from the hypothetical antenna site. This was included to verify 100% 70dBu coverage to the community of license.

Each modification which requires a class change or an antenna site modification has a gain/loss study for population and square kilometers. The studies that include the

community of license change also include a remaining services study which demonstrates more than five (5) remaining services in each loss area.

#### **NATURE OF THE FIRST BROADCASTING COUNTERPROPOSAL**

A summary of all communities and their related channels (present and proposed) is included in Table 1 for reference. First Broadcasting proposes to delete channel 293A and substitute channel 294C at Muenster. In order to accomplish this, various changes and licensed facilities are proposed to be modified in order to create compliance with 73.207. The Counterproposal provides for a continued service at Muenster but with a substantial increase in square kilometers. This is demonstrated by the large increase in the number of persons served by the new 60dBu contour.

The Allotment of channel 294C at Muenster requires the following modifications:

- I) KDXT - Channel 294C, Granbury, Texas. Presently KDXT operates on channel 294C, co-channel with the upgrade of KXGM and has short spacing of 148.45 kilometers. First Broadcasting proposes to eliminate this short spacing by substituting channel 296C1 for channel 294C at a new antenna site. The change also includes a change in community of license from Granbury to Benbrook, Texas. However, when channel 296C1 is substituted for channel 294C, short-spacings to other facilities are created. Those short-spacings and their resolutions are discussed below.
- A) KWKQ - Channel 296A or Channel 296C3, Graham, Texas. KWKQ operates on Channel 296A with a construction permit for channel 296C3 at its licensed class A site. The instant Counterproposal proposes a substitution of channel

234C3 with a site modification for KWKQ. The channel substitution proposed for KWKQ requires no additional spectrum changes.

B) KWBU - Channel 296A Waco, Texas. Presently KWBU operates on channel 296A. The substitution of channel 296C1 for channel 294C to be used by KDXT creates a short spaced to KWBU of 81.36 kilometers. First Broadcasting proposes to eliminate this short spacing by substituting channel 277A for channel 296A at the licensed site of KWBU. However, when channel 277A is substituted at KWBU it creates a short space of 114.31 kilometers to the application site of KWOW at Clifton, Texas and 101.08 kilometers to the KWOW licensed site. First Broadcasting proposes further substitutions and modifications to eliminate this short spacing.

1. KWOW - Channel 277C3, Clifton, Texas. Presently KWOW operates on channel 277C3 with a construction permit to change antenna sites also on channel 277C3. In order to eliminate the aforementioned short spacing created by the substitution of channel 277A at KWBU, First Broadcasting proposes the substitution of channel 281C3 at the KWOW licensed or CP sites. The substitution of channel 281C3 for channel 277C3 at Clifton requires no site modifications on the part of KWOW. However, this substitution of channel 281C3 at Clifton creates a short space to KXYL on channel 281C1 Brownwood, Texas of 64.11 kilometers to the license site and 51.73 kilometers to the CP site. Additional substitutions are proposed to allow KXYL to operate as a class C1 at its present site on channel 245C1.



a) KXYL - channel 281C1 Brownwood, Texas. Presently KXYL operates on channel 281C1 at Brownwood. In order to eliminate the previously mentioned short spacing of channel 277C3 at Clifton, First Broadcasting proposes the substitution of channel 245C1 at the licensed site of KXYL. However, this substitution creates short spacing to one proposed rule making (PRM) and one licensed facility (KBAL San Saba, Texas). Those short-spacings are to be eliminated as follows:

- i) AD 245C3 - Cross Plains, Texas. Presently ALALATEX has a PRM on file with the Commission proposing the allotment of channel 245C3 at Cross Plains. This PRM is short spaced to the use of channel 245C1 at Brownwood by 160.78 kilometers. First Broadcasting proposes to eliminate this short spacing by substituting channel 290C3 for channel 245C3 at the ALALATEX proposed allocation coordinates. This substitution requires no additional spectrum changes. This is the MX point for the First Broadcasting Counterproposal and the ALALATEX petition.
- ii) KBAL - Channel 246A, San Saba, Texas. Presently KBAL operates on channel 246A. The substitution of channel 245C1 at Brownwood creates a short space of 69.87 kilometers to KBAL on channel 246A. First

Broadcasting proposes to eliminate this short spacing by substituting channel 291A for channel 246A at the licensed site of KBAL. However, this substitution creates a short space of 45.56 kilometers to a proposed allotment of channel 291A at Mason, Texas. This short space can be eliminated as follows:

\*) AD 291A - Mason, Texas. Presently the Commission has before it a proposal that seeks the allotment of channel 291A at Mason. However, alternate channels were proposed during a comment period. First Broadcasting proposes the substitution at Mason of channel 259A at the same reference coordinates as those proposed for channel 291A. If for some reason unknown to First Broadcasting, channel 259A is not available as a substitute channel for channel 291A at Mason, the substitution of channel 224A is proposed.

C) KSTA - Channel 296C3 or channel 296A, Coleman, Texas. Presently KSTA operates on channel 296C3 (or channel 296A) at Coleman. If channel 296C1 is allotted to Benbrook it creates a short spacing of 46.04 kilometers to the C3 site and 35.04 kilometers to the class A site. In order to eliminate the short spacing to channel 296C1 at Benbrook, First Broadcasting proposes the

substitution of channel 272C3 for 296C3 at the licensed site of KSTA. No additional channel changes are required in order to effectuate this substitution.

D) KZDL - Channel 296A, Terrell, Texas. Presently KZDL operates on channel 296A and is short spaced to the substitution of channel 296C1 at Benbrook by 43.41 kilometers. First Broadcasting proposes to eliminate this short spacing by modifying the licensed facility of KZDL to channel 295A with a change in the community of license to Kerens, Texas. This will provide Kerens with its first local service and the community of Terrell will continue to receive service from KPYK also licensed to Terrell. Channel 295A can be allotted to Kerens only if channel 296A is deleted at Terrell and channel 296C1 is substituted for channel 294C at Granbury with its license changed to Benbrook. Although channel 295A at Kerens is close to being available as a drop-in channel, there is not adequate spacing for this to occur apart from the First Broadcasting spectrum changes in the Instant Proposal. This is discussed in more detail in the Exhibits section of the Instant Counterproposal.

II) KYNZ - Channel 294A Lone Grove, Oklahoma. Presently KYNZ operates on channel 294A. The substitution of channel 294C for Channel 293A at Muenster creates a short space of 134.69 kilometers to the KYNZ license site. In order to eliminate this short space, First Broadcasting proposes the substitution of channel 296C3 for channel 294A at Lone Grove with a site modification. However, the substitution of channel 296C3 for channel 294A at Lone Grove creates a short space to the license site of KLBC, Durant, Oklahoma as a Class A (licensed) and unused Class C3 (allotment). In addition there is a short space to the proposed

substitution of channel 296A for channel 273A at Madill, Oklahoma. The short spacing of AD 296C3 at Lone Grove to the licensed site of KLBC at Durant is 71.25 kilometers and at Madill is 105.74 kilometers. In addition, the allotment reference coordinates for channel 296C3 at Lone Grove is short spaced to the license site of KVRW, channel 297C2 Lawton, Oklahoma. First Broadcasting offers a scenario which provides adequate spacing in the Instant Counterproposal by modifying the antenna site of KVRW to a point which gives the required spacing to channel 296C3 at Lone Grove. The apparent short spacing to KVRW, AD296A and KLBC is eliminated by the following modifications:

A) AD296A - Madill, Oklahoma. Presently KMAD operates on channel 273A with an application for a one step upgrade to channel 273C3. In addition it has on file a Counterproposal in MM Docket 98-63 which proposes the deletion of channel 273A at Madill and the substitution of channel 273C2 at Whitesboro, Texas. In MM Docket 98-63 the proposed substitution of channel 296A was offered as a substitute channel for KMAD at Madill in order for channel 273C3 to be allocated at Pottsboro, Texas. However, settlements between all parties in MM Docket 98-63 have been concluded and filed with the Allocations Branch. In addition the 15-day comment period for counterproposals have concluded without any objections being filed with the Commission. Therefore, channel 273C2 will be deleted at Madill and allocated to Whitesboro, Texas for use by KMAD. KMAD will no longer need a substitute channel (296A at Madill), since it will be operating on channel 273C2 at Whitesboro. Madill will continue to be served by

KMAD(AM). Under no circumstances will channel 296A (or channel 296C3, which is extraneously shown in the Commission's database) be needed as a substitute channel at Madill. KMAD will operate on channel 273C2 at Whitesboro. If for some reason unknown to its licensee, KMAD is forced to remain at Madill, it will continue to operate on its present channel of 273, since all interest in the substitution of channel 296A for channel 273A at Madill has been withdrawn. The operation of KMAD on channel 273 at Whitesboro or Madill is of no concern to the instant counterproposal, since channel 273 is unrelated to any of the channels involved in the instant First Broadcasting scenario. KMAD had been related to the First Broadcasting counterproposal only through the proposed substitution of channel 296A for channel 273A at Madill, which has now been eliminated by the settlement.

- B) KLBC - Channel 296A (unused channel 296C3) Durant, Oklahoma. Presently KLBC operates on Channel 296A with an unused C3 channel. The substitution of channel 292A for channel 296A at the licensed site of KLBC was proposed in the NPRM of MM Docket 98-63. There were no filings during the comment period of that Docket nor subsequently which conflict with the use of channel 292A for channel 296A at the KLBC license site. In addition, as previously discussed a settlement has been completed in MM Docket 98-63 that calls for the substitution of channel 292A for channel 296A at KLBC. First Broadcasting also proposes the substitution of channel 292A for channel 296A at the license site of KLBC; however, it also notes that channel 292C3 can be substituted if the KLBC licensee desires an upgrade.

- C) KVRW - Channel 297C2, Lawton, Oklahoma. Presently KVRW operates on channel 297C2 at a site which is 4.49 kilometers short spaced to the allocation coordinates of channel 296C3 at Lone Grove. The First Broadcasting Counterproposal proposes a site modification of 4.53 kilometers to eliminate the short space.
- III) KZDF - Channel 295A, McKinney, Texas. Presently KZDF operates on channel 295A at McKinney. The substitution of channel 294C at Muenster creates a short spacing to channel 295A at McKinney or 80.28 kilometers. First Broadcasting proposes to eliminate this short spacing by deleting channel 295A at McKinney and substituting channel 296A at Campbell, Texas as that community's first local service. McKinney will continue to receive local service from KNTU that proposes a community of license change from Denton to McKinney. KTNU is an NCE station that can change its community of license by application. There is no contingency in the community of license change since no change in technical facilities (channel, antenna site, class, ERP or HAAT) is proposed.
- IV) AD294C2 - Channel 294C2 Detroit, Texas. Previously the allotment of channel 294C2 was proposed at Detroit, Texas. The original petitioner requested that his petition be dismissed. If the Commission allows this Counterproposal to be considered, First Broadcasting proposes the substitution of channel 282C2 with a site modification from the proposed allotment site of 294C2. Channel 282C2 is now available due to that channel being released as a proposed substitute channel in MM Docket 95-126. The request of the petitioner in that Docket was completed in MM Docket 97-225 (DA 98-2002). First Broadcasting proposes the

substitution of channel 282C2 for channel 294C2 at Detroit to eliminate the 51.33-kilometer short space created by the allotment of channel 294C at Muenster. Alternatively, channel 238C2 can be substituted for channel 294C2 at Detroit at coordinates NL: 33-38-50, WL: 95-14-03 as described below.

- V) AD238C2 - Channel 238C2 Hugo, Oklahoma. Presently KITX operates on channel 238C2. First Broadcasting proposes the substitution of channel 282C2 for the proposed channel 294C2 at the license site of KITX. As stated above, channel 282C2 is available as a substitute channel at Hugo the same as it is at Detroit. In MM Docket 97-26, the licensee of KHYI Howe, Texas proposed the substitution of channel 237C2 for channel 237C3. In order to accomplish this scenario, channel 294C2 was proposed as a substitute channel at KTIX at Hugo. In the Counterproposal the allotment of channel 238C2 was proposed at Detroit, and channel 294C2 at Hugo. However, the 238C2 at Detroit petitioner proposed coordinates that were 2.32 kilometers short spaced. First Broadcasting proposes a modification of those coordinates to NL: 33-38-50, WL: 95-14-03. This would allow the substitution of channel 238C2 at Detroit at a site that allows the upgrade of KHYI at Howe. If this scenario were followed, the previous petitioners had proposed the substitution of channel 294C2 for channel 238C2 at Hugo that creates a short spacing to the allotment of channel 294C at Muenster of 54.57 kilometers. By using 282C2 as a substitute at either Detroit or Hugo there is no conflict between the instant First Broadcasting Counterproposal and those scenarios advanced in MM Dockets 97-26 and 97-91. However, if channel 282C2

is used as the substitute channel for KITX at its licensed site an additional channel change must be made in order to eliminate a short space.

A) AL284A - Unused Allotment Channel 284A, Antlers, Oklahoma. Presently the Table of Allotments shows an unused channel (284A) at Antlers, not to be confused with the Channel 222C2 allotted in MM Dockets 97-26 and 97-91. If channel 282C2 is used as a substitute for channel 294C2 at the licensed site of KITX it creates a short spacing to the unused channel 284A at Antlers of 17.82 kilometers. First Broadcasting proposes to eliminate this short space by substituting channel 262A for channel 284A with a modified site. There are no additional allotment changes for the substitution of channel 262A for channel 284A at Antlers.

VI) KCLI - channel 294C1, Clinton, Oklahoma. Presently KCLI operates on channel 295C1 with a CP for a one-step channel change to channel 294C1, and an application for another site on channel 294C1. In addition, KCLI has a Counterproposal to delete channel 294C1 at Clinton and allot it to Okarche, Oklahoma. There is no conflict between the substitution of channel 294C at Muenster with KCLI on channel 295C1 or the application site of KCLI on channel 294C1. In addition there is no conflict between the allotment of KCLI on channel 294C2 at Okarche and the First Broadcasting Counterproposal. However, there is a slight short space of 4.58 kilometers for KCLI at its present site when it operates on channel 294C1. First Broadcasting proposes to modify these coordinates to the application site of KCLI that clears the allotment of channel 294C at Muenster by 6.4 kilometers.



This completes the Table of Allotments modifications for the allocation of channel 294C at Muenster, Texas.

### **EXHIBITS EXPLAINED**

Each station that requires a modification of any type is listed and discussed individually with the supporting exhibits explained in detail.

#### **KXGM**

Exhibit E, Figure 1 is an allocation study for channel 294C at Muenster. It uses the reference coordinates that First Broadcasting proposes for this allocation. The study depicts all the major on-channel and adjacent channel modifications required, but not the subchanges. The study shows the spectrum changes required for KDXT, channel 294C at Granbury; KYNZ, channel 294A at Lone Grove, Oklahoma; KZDF, channel 295A at McKinney, Texas; AD294C2 at Detroit, Texas; AD294C2 at Hugo, Oklahoma; and the site change for KCLI, channel 294C1 at Clinton, Oklahoma. Exhibit E, Figure 2 is a map generated using the programs and techniques in the Methods section of the instant Counterproposal. This study depicts the KXGM channel 294C allotment coordinates, a maximum class C 70 dBu contour, and the community boundaries of Muenster. It demonstrates full compliance with §73.315 of the Commission's Rules. Exhibit E, Figure 3 is a map demonstrating the gain area of the 60 dBu contour for KXGM as a full class C on channel 294. At no point does the present KXGM 60 dBu extend beyond the proposed 60 dBu; therefore, there is no loss area.

#### **KDXT**

Presently KDXT operates on channel 294C. The instant Counterproposal proposes to delete channel 294C at Granbury and allocate channel 296C1 at Benbrook. Exhibit E,

Figure 4 is an allocation study using the proposed allotment coordinates for channel 296C1 at Benbrook. It shows modifications needed to KWKQ, Graham, Texas; KWBU, Waco, Texas; KSTA, Coleman, Texas; KZDL, Terrell, Texas; and the AD296C1 at Benbrook relationship to some of these stations with their proposed substitutions. Of particular note is an apparent short space to AD296C3 at Madill, Oklahoma. This entry appears in the database but was not considered in the Comment Period of MM Docket 98-63. See DA 98-860, Paragraphs 4 and 5. In addition, a settlement was reached between the parties in MM Docket 98-63 that withdraws the Counterproposal for channel 273C3 at Pottsboro, Texas and AD273A at Leonard, Texas. Therefore, it is apparent that channel 273C2 will be available for use by KMAD at Madill. A settlement in MM Docket 98-63 provides channel 273C2 for use by KMAD, either at Madill or Whitesboro. In either event, the use of channel 273C2 for KMAD makes the use of channel 296C3 available for use at Lone Grove. Exhibit E, Figure 5 is a map showing the channel 296C1 allotment coordinates, a hypothetical class C1 70 dBu contour, and the Benbrook community boundaries. Exhibit E, Figure 6 is a zoomed view of the channel 296C1 70 dBu and its relationship to the Benbrook community boundaries. It depicts 100% 70-dBu service to the community with the contour exceeding the further most boundary by 2.3 kilometers. Exhibit E, Figure 7 is a U.S. Census Bureau TIGER map used to verify the accuracy of the Benbrook community boundaries. Exhibit E, Figure 8 is a gain/loss study shown in map form. The gain and loss areas are labeled. Exhibit E, Figure 9 is a remaining services study, showing that the entirety of the loss area for AD296C1 at Benbrook will still be served by a minimum of 5 signals. Each contour is numbered, and

the facility listed by contour number, call sign, community of license, and frequency in Exhibit E, Figure 10.

#### KWKQ

Exhibit E, Figure 11 is an allocation study for the use of channel 234C3 at Graham, Texas as a substitute for channel 296C3. It uses the modified coordinates as reference.

Exhibit E, Figure 12 is a map showing the 70 dBu contour, the proposed channel 234C3 allotment coordinates, and the Graham community boundaries. It shows 100% coverage of the community by the 70 dBu contour. Exhibit E, Figure 13 is gain/loss map, showing the gain and loss areas, as well as the gain and loss population counts.

#### KWBU

Exhibit E, Figure 14 is an allocation study showing the spacings for channel 277A at the licensed site of KWBU. It shows a short space to KWOW.L and KWOW.C at Clifton, Texas, which is also on channel 277. Since this short space will be totally eliminated by another substitution, no 70 dBu service map or gain/loss area map is included.

#### KWOW

Exhibit E, Figure 15 is an allocation study for the substitution of channel 281C3 at the licensed site of KWOW, Clifton, Texas. Exhibit E, Figure 16 is an allocation study for the allotment of channel 281 at the KWOW CP site. Both studies depict short spacing to KXYL, Brownwood, Texas. However, since the substitution of channel 281C1 at Brownwood does not require any modifications to the antenna sites of KWOW, no 70 dBu contour or gain/loss map is included.

### KXYL

Exhibit E, Figure 17 is an allocation study for the substitution of channel 245C1 at the licensed site of KXYL, Brownwood, Texas. Since the substitution of channel 245C1 at Brownwood does not require any modifications to the antenna site of KXYL, no 70 dBu contour or gain/loss map is included.

### AD245C3

Exhibit E, Figure 18 is an allocation study for the substitution of channel 290C3 at the allocation site of AD245C3, Cross Plains, Texas. Since the substitution of channel 290C3 at Cross Plains does not require any modifications to the allotment site of AD245C3, no 70-dBu contour or gain/loss map is included. The substitution of channel 290C3 for channel 245C3 eliminates the MX conflict between the First Broadcasting Counterproposal and the ALALATEX petition.

### KBAL

Exhibit E, Figure 19 is an allocation study for the substitution of channel 291A at the licensed site of KBAL, San Saba, Texas. Since the substitution of channel 291A at San Saba does not require any modifications to the antenna site of KBAL, no 70-dBu contour or gain/loss map is included.

### AD291A

Exhibit E, Figure 20 is an allocation study for the substitution of channel 259A at the allocation site of AD291A, Mason, Texas. Since the substitution of channel 259A at Mason does not require any modifications to the allotment site of AD291A, no 70 dBu contour or gain/loss map is included.

Other channels have been proposed as a substitute for channel 291A at Mason. If, for reasons unknown to First Broadcasting, channel 259A cannot be substituted for channel 291A, channel 224A should be considered.

#### KSTA

Exhibit E, Figure 21 is an allocation study showing the spacings for channel 272C3 at the licensed site of KSTA, Coleman, Texas. There are no short spaces shown. Since no short space exists and no antenna site change is necessary, no 70-dBu-service map or gain/loss area map is included.

#### KZDL

Exhibit E, Figure 22 is an allocation study showing the allotment of channel 295A for use by KZDL at Kerens, Texas after channel 296A is deleted at Terrell, Texas. The study indicates that clear spacing nearly exists, which would allow the use of channel 295A at Kerens, apart from the instant Counterproposal. However, an exhaustive study has determined there are no clearly spaced sites until the modification of KDXT at Granbury to channel 296C1 at Benbrook. Exhibit E, Figure 23 shows that channel 295A is in compliance with §73.315 of the Commission's Rules. Exhibit E, Figure 24 is a gain/loss map showing the area and population gained and lost by the allocation of channel 295A at Kerens and the deletion of channel 296A at Terrell. Exhibit E, Figure 25 is a remaining services study, showing that the entirety of the lost area proposed in the instant Counterproposal is encompassed by a minimum of 5 other signals. Exhibit E, Figure 26 is a list of the contours displayed in Exhibit E, Figure 24. Contours are listed by number, call sign, city of license, and frequency. Exhibit E, Figure 27 is an allocation map depicting no open space for the allotment of channel 295A apart from the instant

Counterproposal. The study allows for the Commission's 0.5 kilometer "rounding" process. The inset in Exhibit E, Figure 26 is a zoomed map of the area of closest possibility. It also uses the 0.5-kilometer "rounding" process. As depicted by the exhibit, clear spacing is short by 270 meters.

### KYNZ

Exhibit E, Figure 28 is an allocation study showing the spacings of channel 296C3 at Lone Grove, Oklahoma for use by KYNZ. The study shows short spacing to AD296 at Madill, Oklahoma and Durant, Oklahoma. The AD296 at Madill was discussed earlier. The entry of channel 296C3 is of no concern. Although it is in the database, it was not considered as an allocation in MM Docket 98-63. (See DA 98-860, Paragraphs 4 and 5.) In addition, all parties in this NPRM have reached a settlement that on file with the Commission that has passed the 15-day comment period without any objections. The settlement provides for the upgrade of KMAD on its current channel 273. Therefore, channel 296 is not needed as a substitute at Madill. The operation of KMAD on channel 273C2 is in no way related to the allotment of channel 296C3 at Lone Grove. Exhibit E, Figure 29 is a map showing the channel 296C3 allotment reference coordinates, a hypothetical class C3 70 dBu contour, and the Lone Grove community boundaries. It demonstrates compliance with §73.315 of the Commission's Rules. Exhibit E, Figure 30 is a gain/loss study map, which demonstrates that there is no loss area.

### KMAD

Following the settlement with all parties in MM Docket 98-63, KMAD (at Madill or Whitesboro) is no longer a factor in the First Broadcasting counterproposal. However, the following studies are included in order to demonstrate to the Commission that the

allotment of channel 273C3 at Whitesboro is in compliance with the Commission's Rules and is therefore no longer a factor in the instant counterproposal. Exhibit E, Figure 31 is an allocation study showing that channel 273C2 can be allocated to Whitesboro once channel 273A is deleted at Madill. Exhibit E, Figure 32 is a 70-dBu contour map that demonstrates compliance with §73.315 of the Commission's Rules and Regulations. Exhibit E, Figure 33 is an allocation map showing a fully spaced allotment window for channel 273C2 at Whitesboro that is in compliance with the settlement between all parties in MM Docket 98-63.

#### KLBC

Exhibit E, Figure 34 is an allocation study for channel 292A at the licensed site of KLBC, Durant, Oklahoma. It uses the licensed site of KLBC as reference and shows that no additional changes in the spectrum are necessary for this substitution. In addition, it demonstrates that there are no additional conflicts with the substitution of channel 292A as proposed in MM Docket 98-63. Reference to the spacing between the site and the community of license is omitted, since no site change is required. The licensee of KLBC has consented to the allotment of channel 292A and the forfeiting of its unused class C3. However, First Broadcasting studies depict that channel 292C3 can be substituted for channel 296C3 if the licensee desires. Exhibit E, Figure 35 is an allocation study showing the allocation of channel 292C3 at Durant. Exhibit E, Figure 36 is a 70 dBu contour map that demonstrates compliance with §73.315 of the Commission's Rules. Exhibit E, Figure 37 is a gain/loss map for the KLBC licensed class A facility compared to the allotment of channel 292C3. Exhibit E, Figure 38 is a gain/loss map depicting the

allocation coordinates of the unused channel 296C3 compared to the proposed allotment of channel 292C3.

#### KVRW

Exhibit E, Figure 39 is an allocation study using the modified antenna site for KVRW. It shows that no additional changes are required for this modification. In addition, it demonstrates clear spacing to the proposed upgrade of KYNZ on channel 296C3 at Lone Grove. Exhibit E, Figure 40 is a map showing the hypothetical 70 dBu contour for KVRW at the modified site. It demonstrates compliance with §73.315. Exhibit E, Figure 41 is a gain/loss study for the site change proposed at Lawton.

#### KZDF

Exhibit E, Figure 42 is an allocation study showing spacing for the allotment of channel 296A at Campbell, Texas, in lieu of channel 295A at McKinney, Texas. The study makes the allotment of channel 292A or channel 292C3 substitution at Durant, which has been previously discussed. In addition, it acknowledges the database entry of channel 296C3 at Madill, which was not considered in MM Docket 98-63. Furthermore, it acknowledges the required substitution of channel 295A at Kerens for channel 296A at Terrell. The allotment of channel 296A at Campbell is mutually exclusive with the present licensed site of KZDF at McKinney and cannot be allotted apart from the present First Broadcasting Counterproposal's scenario. The study acknowledges other First Broadcasting proposed Table of Allotments modifications, such as KDXT, Granbury, Texas to channel 296C1 at Benbrook; KYNZ, Lone Grove, Oklahoma, to channel 296C3; KZDL, Terrell, Texas to channel 295A at Kerens, Texas; and KXGM, Muenster, Texas from channel 293A to channel 294C. Exhibit E, Figure 43 is a map showing compliance



with §73.315 of the Commission's Rules. Exhibit E, Figure 44 is a gain/loss map showing the amount of land gained and lost within the 60 dBu contour, as well as the population gained and lost. Exhibit E, Figure 45 is a remaining service study, showing that all points within the loss area receive a minimum of 5 signals. Exhibit E Figure 46, is a listing of the facilities in the remaining services study map in Exhibit E, Figure 42. The facilities are listed by contour, call sign, city of license, and frequency.

#### KNTU

Exhibit E, Figure 47 is a map showing the current FCC F(50,50) 60 dBu contour for KNTU, Denton, Texas. This map shows that the entire community of McKinney is encompassed by the 60-dBu contour. Because KNTU is a non-commercial educational (NCE) facility, Commission rules state that NCE stations need only cover the city of license with a 60-dBu contour. The map also demonstrates that no technical changes are necessary for the proposed change in city of license from Denton to McKinney. Denton will continue to be served by KHCK, channel 256C; KHKS, channel 291C; and KTNO(AM), 1440 kHz.

#### AD294C2

Exhibit E, Figure 48 is an allocation study showing the spacings for channel 282C2 as a substitute for channel for channel 294C2 at Detroit, Texas. Previously channel 294C2 was proposed as a new allotment at Detroit. Channel 238C2 has been also been proposed at Detroit with channel 294C2 proposed as a substitute for channel 238C2 at the licensed site of KITX, Hugo, Oklahoma. Regardless of the final allotment of these channels, the insertion of channel 282C2 creates a substitute that allows an allotment at Detroit and/or a substitution at Hugo. The substitution of channel 282C2 at Detroit requires a site

modification of 6.25 kilometers from the proposed allotment of channel 294C2. However, this site restriction is only 15.69 kilometers from the Detroit community reference coordinates. In MM Docket 97-26 channel 238C2 was offered as a substitute channel for Detroit with channel 294C2 to be allocated as a substitute for channel C2 at the licensed site of KITX, Hugo, Oklahoma. However, the petitioner proposed channel 238C2 at Detroit with coordinates that had short spacing to the proposed allotment of channel 237C2 at Howe, Texas. First Broadcasting, in the instant Counterproposal, offers a modification of the proposed reference coordinates for channel 238C2 at Detroit. These coordinates provide the required spacing to channel 237C2 at Howe. Verification of the spacing modification is shown in Exhibit E, Figure 49.

#### KITX

Exhibit E, Figure 50 is an allocation study for the substitution of channel 282C2 at the licensed site of KITX, channel 238C2, Hugo, Oklahoma. Channel 282C2 has recently been released since it was removed as a channel substitution in MM Docket 95-126. The Docket was concluded in MM Docket 97-225. Since the substitution is proposed at the licensed site of KITX, the distance to the community of license, contour map, and gain/loss maps are omitted. The study depicts a short space to Antlers, Oklahoma on unused channel 284A. This channel is not to be confused with the recently allotted channel 222C2, which was placed at Antlers in MM Docket 97-26.

#### AL284A

The Commission's database lists vacant channel 284A at Antlers. First Broadcasting proposes the substitution of channel 262A for channel 284A with a site modification. Exhibit E, Figure 51 is an allocation study showing the separations for the substitution of

channel 262A for channel 284A at Antlers. The allotment uses only a 5-kilometer site restriction from the reference coordinates for the city of Antlers. In addition, it is an unused allotment and is not an existing facility. Therefore, no 70 dBu contour map or gain/loss study is shown.

#### AL222C2

Channel 222C2 was allocated to Antlers, Oklahoma in MM Docket 97-26. However, it continues to appear in the Commission's database as a proposed allotment of channel 294C2. This allotment would be short spaced to channel 294C at Muenster by 43.0 kilometers. Therefore, Exhibit E, Figure 52 is an allocation study showing the allocation of channel 222C2 in lieu of channel 294C2.

#### KCLI

Exhibit E, Figure 53 is an allocation study using the application site of KCLI, channel 294C1 at Clinton, Oklahoma. The licensee of KCLI is in agreement to have its Clinton reference coordinates modified to this site. As shown in this study, KCLI at the application gives clear spacing to channel 294C at Muenster. Since this is a site change proposed by the KCLI licensee (which is being made by application), no 70 dBu contour map or gain/loss map is included.

#### FIRST BROADCASTING PRM GAIN-LOSS AREA

Exhibit E, Figure 54 is a tabulation of the gain/loss area for each facility that requires an antenna relocation or class change. Stations that are proposed to have only their present channel substituted at their license site, and require no class change are not included in this study. It is assumed that the service they would provide with a channel change would not deviate from their current operations. The study includes eleven facilities that

have a deviation in their coverage area proposed by the instant Counterproposal. Listed in the study is each station's loss and gain area in square kilometers and the population gains and losses in number of persons according to the U.S. Census Bureau's estimated 1999 population figures. Cumulative study No. 1 does not include any participation from Madill, Oklahoma and shows a loss area of 9,207 square kilometers and a gain area of 41,197 square kilometers. Therefore, the study has a net gain area of 31,990 square kilometers. In addition, cumulative study No. 1 has a population loss of 367,287 persons and a net gain of 3,875,372 persons. This makes the net population gain 3,508,085 persons. In cumulative study No. 1, Durant, Oklahoma used the allotment of channel 292C3 for comparison. Cumulative Study number 2 has the same participating stations as Cumulative Study number 1, but Durant, Oklahoma compares channel 296C3 to channel 292C3. This makes the total loss area 11,148 square kilometers and the gain area 39,985 square kilometers for a net gain of 28,837 square kilometers. The population comparisons depict a loss to 385,494 persons and a population gain of 3,866,577 persons for a net gain of 3,481,083 persons. If the maximum area and number of persons served are considered, there would be a new service to 3,531,419 persons while the minimum number of persons served under the First Broadcasting Counterproposal would be a new 60 dBu service to 3,481,083 persons.

### PROPOSED ELIMINATION OF SHORT SPACING

The First Broadcasting Counterproposal, if adopted will eliminate existing short spaces between various stations:

KWBU to KLFX.A Nolanville 8.7 kilometers short

KWBU to KLFX.L Nolanville - 7.25 kilometers short

KWBU to KGSR.L Bastrop - 4.54 kilometers short

KWOW.L to KOOV Copperas Cove - 7.2 kilometers short

KWOW.C to KOOV Copperas Cove - 5.25 kilometers short

KZDF to KZDL Terrell - 5.85 kilometers short

KZDF to Unused channel 296C3 Durant 5.49 kilometers short

KZDL to Unused channel 296C3 Durant - 3.99 kilometers short

KXGM to KYNZ Lone Grove - 5.86 kilometers short

The elimination of the short spacing shown above is a significant attribute of the First Broadcasting Counterproposal.

### CONCLUSION

The First Broadcasting Counterproposal has demonstrated that it is in technical compliance with the present Commission rules concerning such actions. The Counterproposal produces three new first local services. Benbrook, Texas, a community of 19,564 persons (according to 1990 Census Bureau data) will receive its first local service, as well as Kerens, Texas and Campbell, Texas. Finally, the Counterproposal creates a new 60-dBu service to a minimum of 3,481,083 persons.

In Support of a  
**COUNTERPROPOSAL – MM Docket 98-198; RM-9304**  
 Muenster, Texas  
 Benbrook, Texas  
 Lone Grove, Oklahoma

```

33 26 13 N.                Class C                Search Date
97 29 05 W.                Current rules spacings          11-18-98
----- Channel 294 -106.7 MHz -----

```

Petitioner Expression of  
Interest Withdrawn. However,  
Ch 282C2 could be Substituted  
See Detroit Channel Study

Continued on next page

Continued from previous page

33 26 13 N.	Class C				Search Date		
97 29 05 W.	Current rules spacings				11-18-98		
----- Channel 294 -106.7 MHz -----							
Call	Ch#	City	State	Bear'	Dist'	R'grd	Margin
=====							
AD294	294C2	Hugo	OK	74.2	194.43	249.0	-54.57 *
Of Concern							
Substitution of Ch 282C2 Proposed							
See Hugo Channel Spacing Study							
AD294	294C2	Antlers	OK	66.8	206.00	249.0	-43.00 *
Of No Concern							
Substitute Ch 222C2 Allotted							
by FCC Staff in MM Docket 97-26.							
See DA 98-1650 & Antlers Channel Study							
KCLIFM	294C1	Clinton	OK	328.8	265.42	270.0	-4.58 *
DE294	294C1	Clinton	OK	328.7	265.50	270.0	-4.50 *
Of Concern							
Agreement to Relocate to Present							
CP Site. See KCLI.C Below							
KYNZ	296C3	Lone Grove	OK	20.1	96.05	96.0	0.05 *
Of Note							
Substitution to Ch 296C3 &							
Site Change.							
KHKS	291C	Denton	TX	153.0	105.42	105.0	0.42 *
KHKS	291C	Denton	TX	152.9	105.60	105.0	0.60 *
AD296	296C3	Madill	OK	41.5	99.20	96.0	3.20 *
AD296	296A	Madill	OK	41.5	99.20	95.0	4.20 *
KCLI.C	294C1	Clinton	OK	336.6	276.40	270.0	6.40 *
Of Note:							
CP Site Referred to Above							
ALOPEN	292C2	Wichita Falls	TX	296.5	112.33	105.0	7.33 *
AD294	294C2	Okarche	OK	349.4	257.56	249.0	8.56 *
KDXTFM	294C	Benbrook	TX	195.7	115.09	105.0	10.09 *
Of Note:							
Channel, Site & Community Change							
Proposed in Instant Statement							
KTLS.C	293C3	Holdenville	OK	28.4	186.32	176.0	10.32

Continued on the next page

Continued from the previous page

33 26 13 N.	Class C	Search Date
97 29 05 W.	Current rules spacings	11-18-98

----- Channel 294 -106.7 MHz -----

Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
------	-----	------	-------	-------	-------	-------	--------

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KZDL	295A	Kerens	TX	142.9	180.87	165.0	15.78
------	------	--------	----	-------	--------	-------	-------

Of Note:

Change in Channel, Site & Community

of License in Order to Accommodate

Ch 296C1 (KDXT) @ Benbrook

See KDXT Allotment Study

AD291	291A	Pauls Valley	OK	11.1	137.55	95.0	42.55
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KVRW	297C2	Lawton	OK	330.7	148.90	105.0	43.90
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AD291	291A	Sulphur	OK	19.6	139.64	95.0	44.64
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KZDL	296A	Terrell	TX	121.5	140.98	95.0	45.98
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KOES.A	295C2	Stamford	TX	256.7	236.76	188.0	48.76
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ALOPEN	295C2	Stamford	TX	256.7	236.76	188.0	48.76
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KZDF	296A	Campbell	TX	99.1	153.26	95.0	56.26 *
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Of Note:

Change in Channel, Site & Community

of License in Order to Accommodate

Ch 294C (KGM) @ Muenster &

Ch 296C1 (KDXT) @ Benbrook

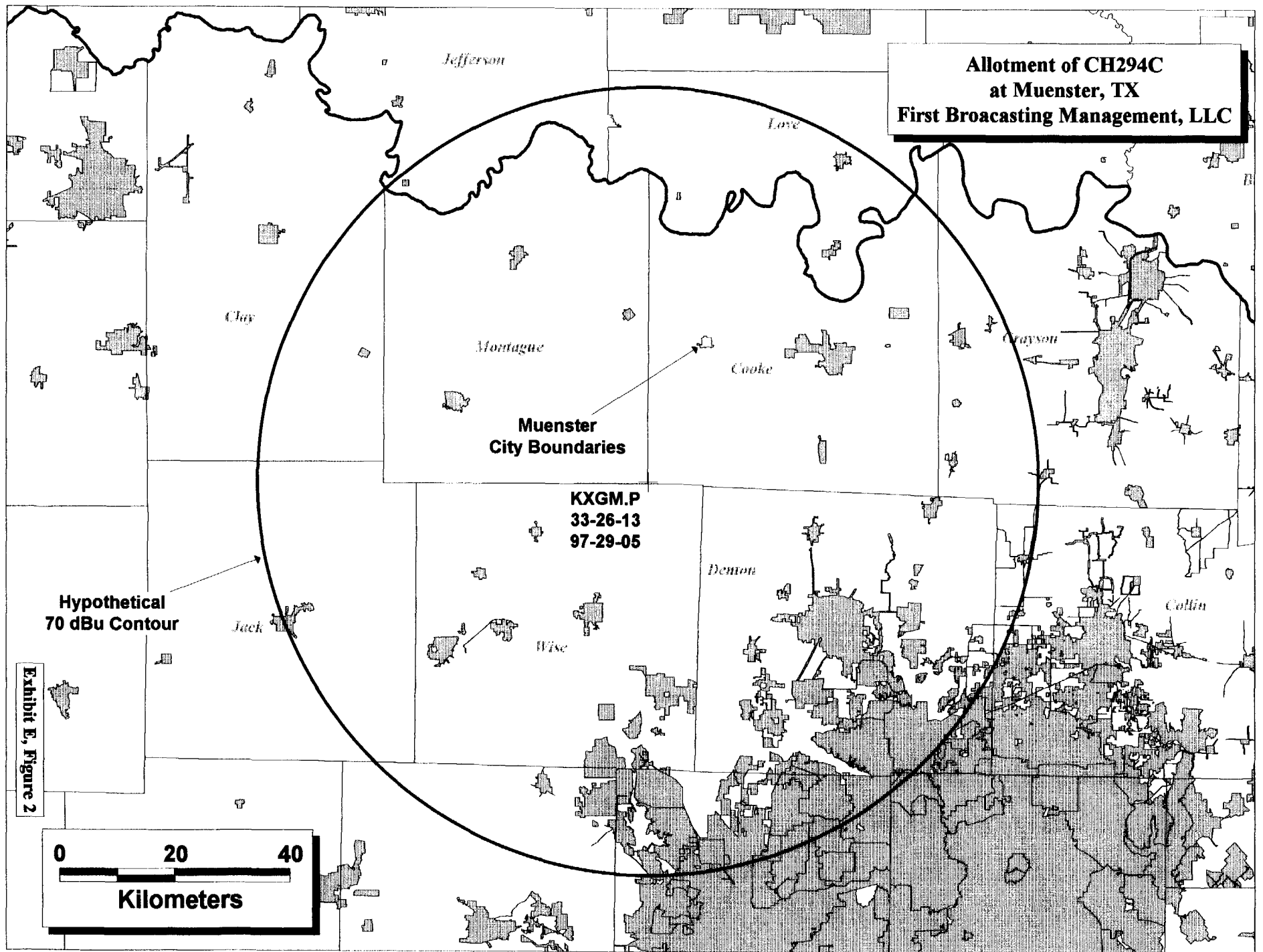
See KDXT Allotment Study

@ NL: 33-12-41, WL: 95-51-39

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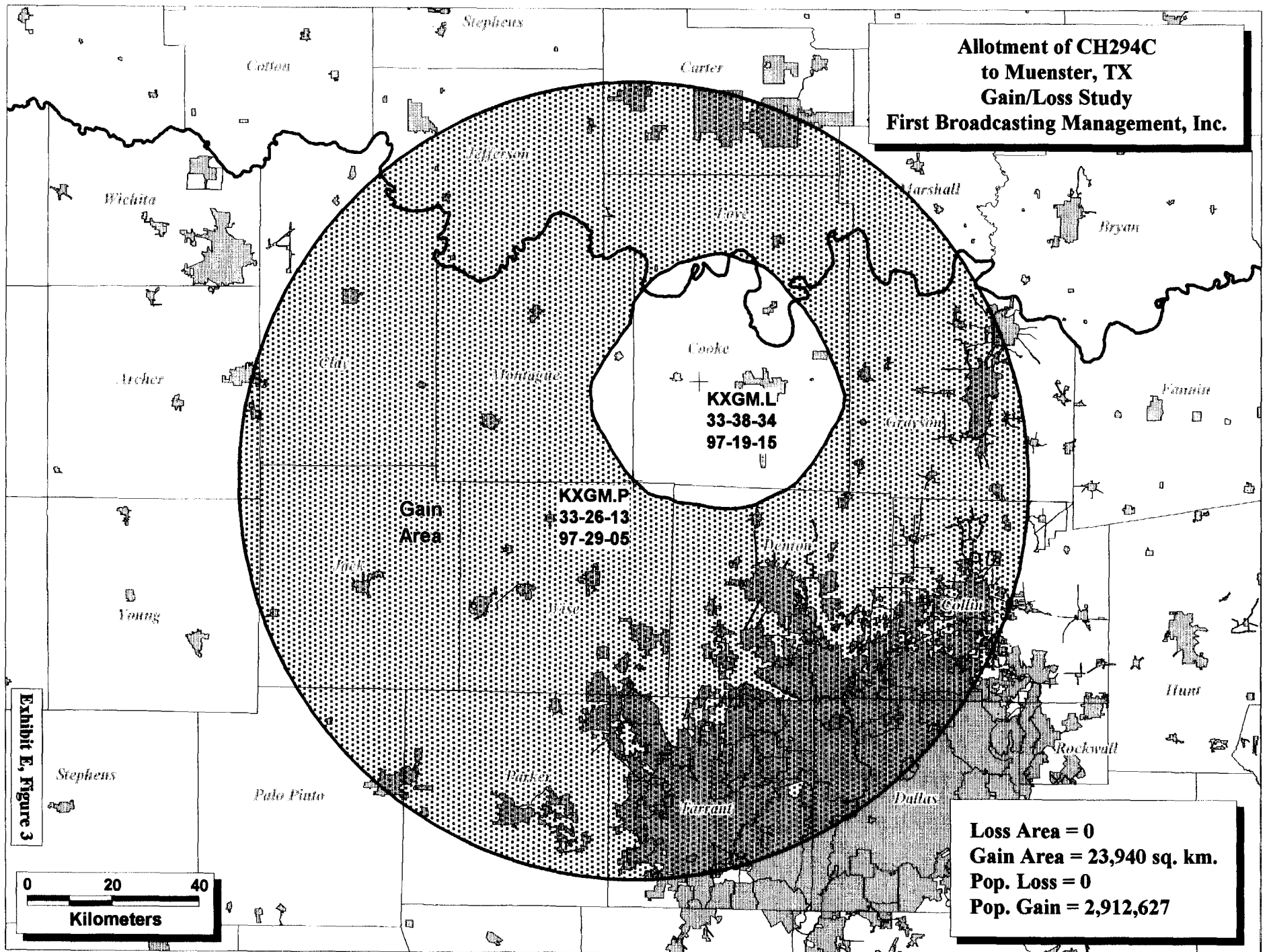


**Allotment of CH294C  
at Muenster, TX  
First Broadcasting Management, LLC**



**Exhibit E, Figure 2**

**Allotment of CH294C  
to Muenster, TX  
Gain/Loss Study  
First Broadcasting Management, Inc.**



**KXGM.P**  
\*33-26-13  
97-29-05

**KXGM.L**  
33-38-34  
97-19-15

**Gain  
Area**

**Loss Area = 0  
Gain Area = 23,940 sq. km.  
Pop. Loss = 0  
Pop. Gain = 2,912,627**

**Exhibit E, Figure 3**

In Support of a  
**COUNTERPROPOSAL – MM Docket 98-198; RM-9304**

**Benbrook, Texas**

Lone Grove, Oklahoma

[DEPICTING SPACINGS, SUBSTITUTIONS & MODIFICATIONS REQUIRED

FOR ALLOTMENT OF CHANNEL 296C1 @ BENBROOK]

(USING ALLOTMENT COORDINATES AS REFERENCE)

32 26 17 N.

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Class C1

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Search Date

97 49 06 W.

## Current rules spacings

11-18-98

----- Channel 296 -107.1 MHz -----

Call	Ch#	City	State	Bear'	Dist'	R'grd	Margin
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Community of Benbrook	TX	51.5	42.84
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Reference Coordinates:

North latitude: 32-29-54

West Longitude: 97-49-47

KWKO.C 296C3 Graham TX 316.5 105.38 211.0 -105.62 \*

KWKO	296A	Graham	TX	316.5	105.38	200.0	-94.62	*
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**Of Concern:**

### Substitution of Ch 234C3 Proposed

Site Change @ NL: 33-02-39, NL: 98-46-27

KWBU	296A	Waco	TX	148.0	118.64	200.0	-81.36	*
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**Of Concern:**

### Substitution of Ch 277A Proposed

@ Licensed Site

KDXTFM 294C Granbury TX 226.8 26.38 105.0 -78.62 \*

KDXTFM 294C	Granbury	TX	226.2	29.80	105.0	-75.20	*
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Of No Concern:

**Licensed Site of Petitioner**

### Change of Channel, Site &

@ Community of License Proposed.

KSTAFM 296C3 Coleman	TX	246.9	164.96	211.0	-46.04	*
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**Of Concern:**

### Substitution of Ch 272C3 Proposed

@ Licensed Site.

KZDL	296A	Terrell	TX	76.3	156.59	200.0	-43.41	*
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**Of Concern:**

### Change of Channel, Site &

Community of License Proposed

to Kerens, Texas, Ch 295A

@ NL: 32-08-15, WL: 96-19-10.

KSTAFM 296A	Coleman	TX	246.9	164.96	200.0	-35.04	*
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**Of Concern:**

### Substitution of Ch 272C3 Proposed

@ Licensed Site.

**EXHIBIT E, FIGURE 4**

Continued on next page

Continued from previous page

32 26 17 N.	Class	Search Date
97 49 06 W.	Current rules spacings	11-18-98

----- Channel 296 -107.1 MHz -----

Call	Ch#	City	State	Bear'	Dist'	R'grd	Margin
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	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100	101	102	103	104	105	106	107	108	109	110	111	112	113	114	115	116	117	118	119	120	121	122	123	124	125	126	127	128	129	130	131	132	133	134	135	136	137	138	139	140	141	142	143	144	145	146	147	148	149	150	151	152	153	154	155	156	157	158	159	160	161	162	163	164	165	166	167	168	169	170	171	172	173	174	175	176	177	178	179	180	181	182	183	184	185	186	187	188	189	190	191	192	193	194	195	196	197	198	199	200	201	202	203	204	205	206	207	208	209	210	211	212	213	214	215	216	217	218	219	220	221	222	223	224	225	226	227	228	229	230	231	232	233	234	235	236	237	238	239	240	241	242	243	244	245	246	247	248	249	250	251	252	253	254	255	256	257	258	259	260	261	262	263	264	265	266	267	268	269	270	271	272	273	274	275	276	277	278	279	280	281	282	283	284	285	286	287	288	289	290	291	292	293	294	295	296	297	298	299	300	301	302	303	304	305	306	307	308	309	310	311	312	313	314	315	316	317	318	319	320	321	322	323	324	325	326	327	328	329	330	331	332	333	334	335	336	337	338	339	340	341	342	343	344	345	346	347	348	349	350	351	352	353	354	355	356	357	358	359	360	361	362	363	364	365	366	367	368	369	370	371	372	373	374	375	376	377	378	379	380	381	382	383	384	385	386	387	388	389	390	391	392	393	394	395	396	397	398	399	400	401	402	403	404	405	406	407	408	409	410	411	412	413	414	415	416	417	418	419	420	421	422	423	424	425	426	427	428	429	430	431	432	433	434	435	436	437	438	439	440	441	442	443	444	445	446	447	448	449	450	451	452	453	454	455	456	457	458	459	460	461	462	463	464	465	466	467	468	469	470	471	472	473	474	475	476	477	478	479	480	481	482	483	484	485	486	487	488	489	490	491	492	493	494	495	496	497	498	499	500	501	502	503	504	505	506	507	508	509	510	511	512	513	514	515	516	517	518	519	520	521	522	523	52
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AD296	296C3	Madill	OK	27.7	209.03	211.0	-1.97	*
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Of No Concern:

In Data Base but not

Published in NPRM or

Considered in MM Docket 98-63

See DA 98-860

Channel Study for Substitute 224A included

For Use by KMAC if it is Unsuccessful in its

Request for Ch 273C2 in MM Docket 98-63

& is Ordered from Ch 273A.

KOAI	298C1 Fort Worth	TX	78.1	80.87	82.0	-1.13 *
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Of No Concern:

**Auxiliary Site**

KYNZ	296C3 Lone Grove	OK	17.7	211.00	211.0	0.00	*
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**Of Note:**

Proposed Allotment Site of

Ch 296C3 for KYNZ in Instant PRM @

NL: 34-15-01, WL: 97-07-42

KOAI	298C1	Fort Worth	TX	78.6	82.02	82.0	0.02	*
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KZDF	296A	Campbell	TX	64.9	202.37	200.0	2.37 *
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Of Note:

### Proposed Channel, Site & Community of

License Change Proposed in Instant PRM

to Campbell, TX @ NL: 33-12-41, WL: 95-51-39

DE296	296C3 Durant	OK	36.9	216.86	211.0	5.86 *
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Of Note:

Channel Study for Substitute 292C3 included

For Use by KLBC in Order it Use Ch 296C3

@ Lone Grove, Oklahoma

AD296	296A	Madill	OK	27.7	209.03	200.0	9.03	*
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Of Note:

Channel Study for Substitute 224A included

For Use by KMAD if it is Unsuccessful in its

Request for Ch 273C2 in MM Docket 98-63

& is Ordered from Ch 273A.

KXGM	294C	Muenster	TX	15.7	115.09	105.0	10.09
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**Of Note:**

### Proposed Allotment Site of

Ch 296C3 in Instant PRM @

NL: 34-15-01, WL: 97-07-42

Continued on next page

Continued from previous page

32 26 17 N. Class C1 Search Date  
 97 49 06 W. Current rules spacings 11-18-98  
 ----- Channel 296 -107.1 MHz -----

Call	Ch#	City	State	Bear'	Dist'	R'grd	Margin
KZDL	295A	Kerens	TX	103.3	145.07	133.0	12.07 *

Of Note:

Proposed Channel, Site & Community of  
 License Change Proposed in Instant PRM  
 to Kerens, TX @ NL: 32-08-15, WL: 96-19-10

KZDF	295A	Mckinney	TX	51.3	146.37	133.0	13.37
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Of Note:

Present Licensed Site of KZDF  
 Before Change Proposed in Instant PRM

KLBC.A	296A	Durant	OK	36.9	216.86	200.0	16.86
KLBC	296A	Durant	OK	36.9	216.86	200.0	16.86
KLFX.A	297A	Nolanville	TX	171.4	150.73	133.0	17.73
KLFX	297A	Nolanville	TX	172.1	150.94	133.0	17.94
DE299	299A	Jacksboro	TX	340.0	94.28	75.0	19.28
ALOPEN	299A	Jacksboro	TX	340.0	94.28	75.0	19.28
AD299	299A	Jacksboro	TX	340.0	94.28	75.0	19.28
ALOPEN	296C3	Durant	OK	33.3	237.16	211.0	26.16

KWFSFM	297C1	Wichita Falls	TX	334.9	204.07	177.0	27.07
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Of Note:

Proposed Allotment Site of  
 Channel & Site Proposed in Interrelated &  
 Parallel Petition NL: 34-06-14, WL: 98-44-55

KJKB.A	299C3	Jacksboro	TX	340.1	107.34	76.0	31.34
ALOPEN	299C3	Jacksboro	TX	340.1	107.34	76.0	31.34
KGSR	296C2	Bastrop	TX	174.9	257.83	224.0	33.83
KSCS	242C	Fort Worth	TX	78.3	81.75	41.0	40.75
KOES.C	295C2	Stamford	TX	285.5	207.95	158.0	49.95

=====

**Allotment of CH296C1  
to Benbrook, TX  
First Broadcasting Management, LLC**

Hypothetical  
70 dBu Contour

Benbrook  
City Boundaries

AD296C1  
(KDXT.P)  
32-26-17  
97-49-06

Eastland

Erath

Hood

Somervell

Johnson

Bosque

Palo Pinto

Parker

Tarrant

Exhibit E, Figure 5

0 20 40  
Kilometers

**Allotment of CH296C1  
to Benbrook, TX  
(Zoomed view)  
First Broadcasting Management, LLC**

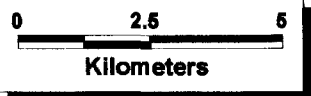
**Benbrook  
City Boundaries**

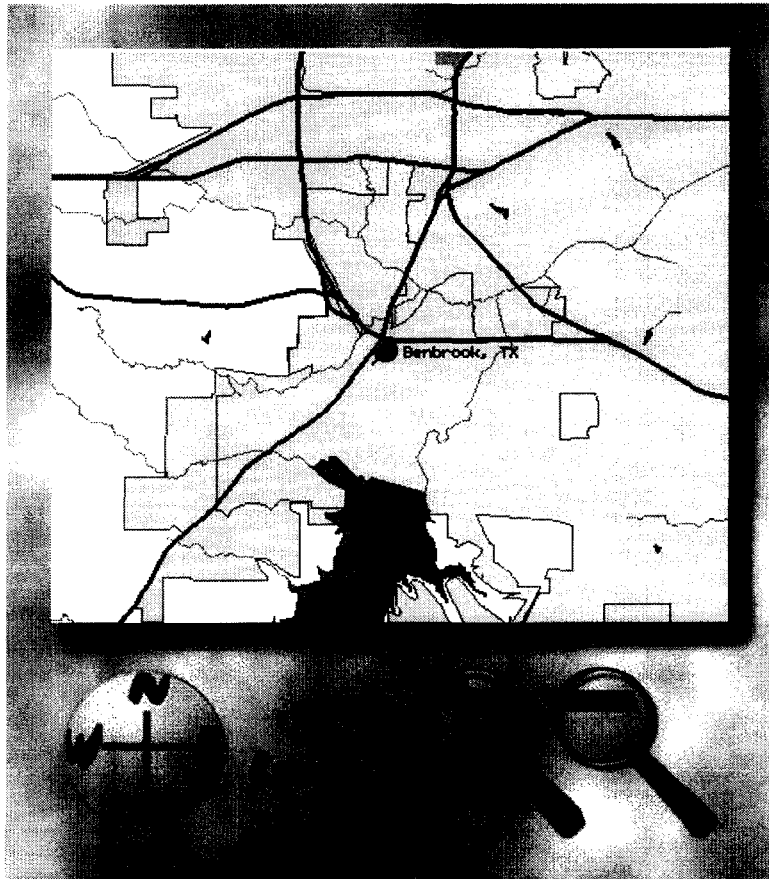
**Hypothetical  
70 dBu Contour**

**2.3 km**

*Tarrant*

**Exhibit E, Figure 6**





Scale: 1:114291 (Centered at Lat: 32.6853561 Lon: -97.4563293)

REDRAW MAP

Click ON THE IMAGE to:

- ☐ Zoom in, factor:
- ☐ Zoom out, factor:
- ☒ Move to new center
- ☐ Place Marker (select symbol be
- ☐ Download GIF image

OR

REDRAW MAP

with any option selected below

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OFF/ON Layer

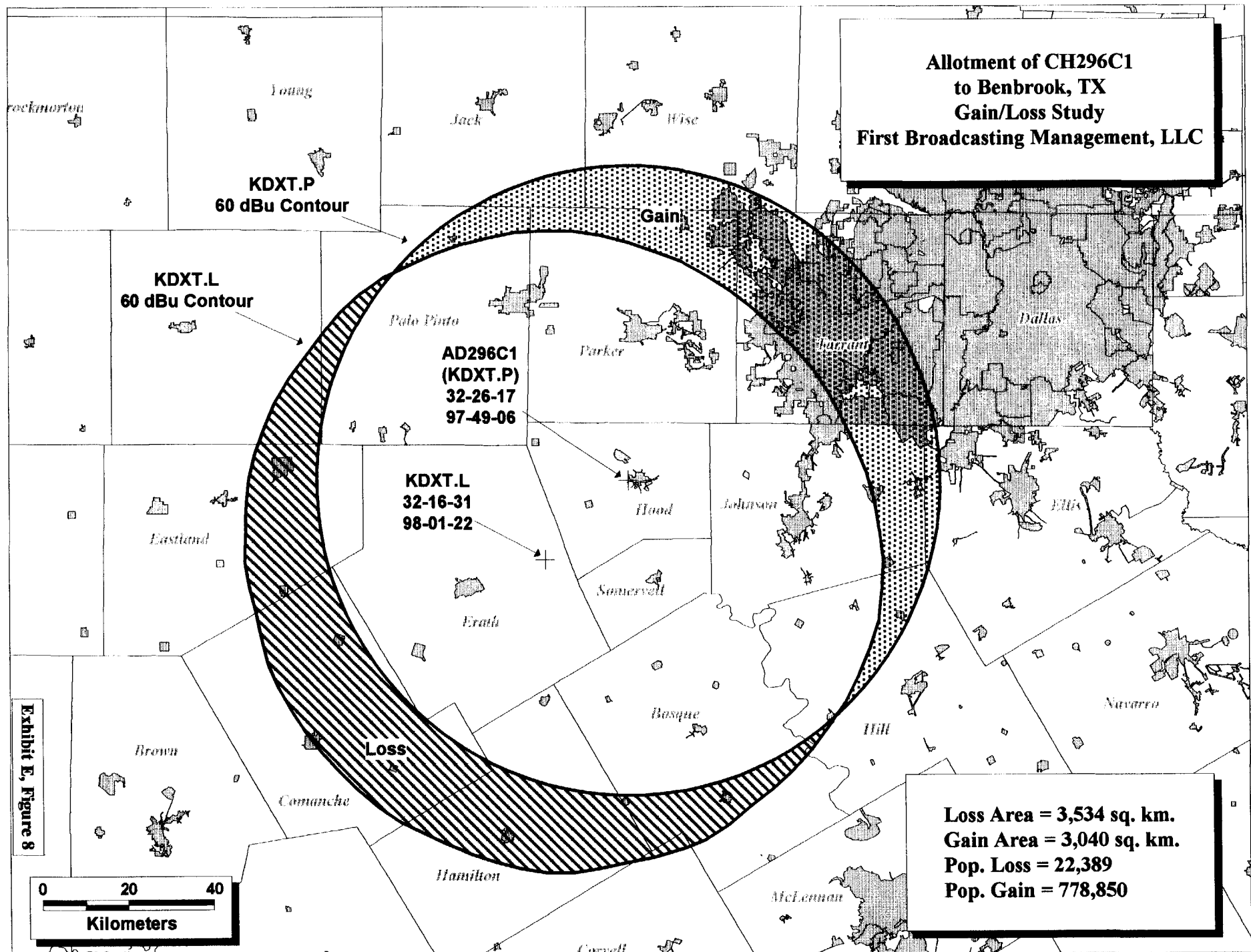
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| <input type="checkbox"/> <input type="checkbox"/> Cens bg bounds         | <input type="checkbox"/> <input type="checkbox"/> US Hw     |
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| <input type="checkbox"/> <input type="checkbox"/> Counties               | <input type="checkbox"/> <input type="checkbox"/> Zipcode   |
| <input type="checkbox"/> <input type="checkbox"/> Indian Resv            |   |
| <input type="checkbox"/> <input type="checkbox"/> Highways               |   |
| <input type="checkbox"/> <input type="checkbox"/> Parks and Other        |   |
| <input type="checkbox"/> <input type="checkbox"/> MSA/CMSA               |   |
| <input type="checkbox"/> <input type="checkbox"/> Cities/Towns           |   |
| <input type="checkbox"/> <input type="checkbox"/> Railroad               |   |
| <input type="checkbox"/> <input type="checkbox"/> Shoreline              |   |
| <input type="checkbox"/> <input type="checkbox"/> Streets                |   |
| <input type="checkbox"/> <input type="checkbox"/> Census Tracts          |   |

If your browser doesn't support client-side imagemaps, use the controls below to navigate the map.

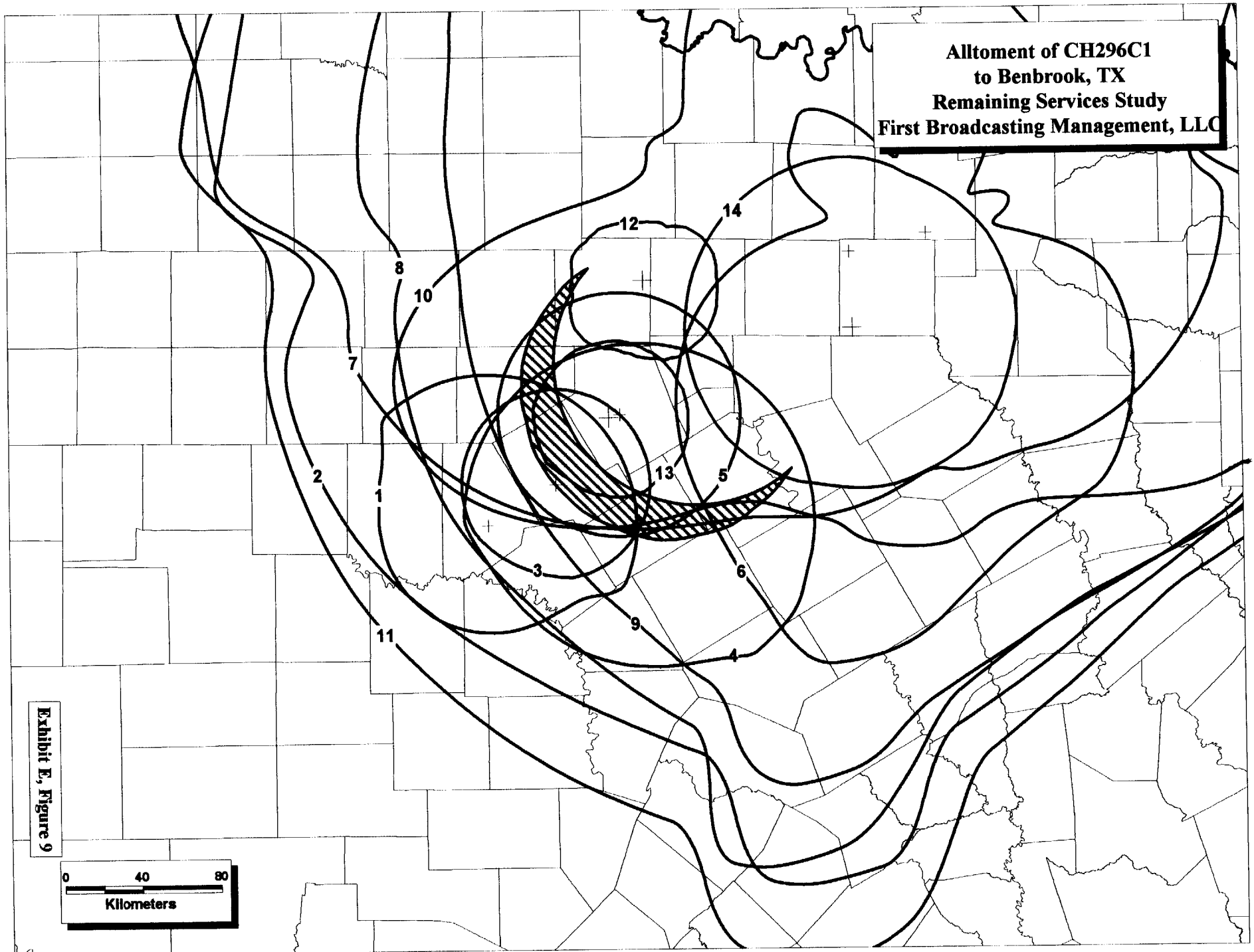
[NW](#)   [N](#)   [NE](#)  
[Zoom In](#)   [W](#)   [Pan](#)   [E](#)   [Zoom Out](#)  
[SW](#)   [S](#)   [SE](#)

Here is the [FAQ](#) and [instructions](#) on how to include these maps in your own web documents. The old mapbrowser has been moved to a new [location](#).





**Alltoment of CH296C1  
to Benbrook, TX  
Remaining Services Study  
First Broadcasting Management, LLC**



**Exhibit E, Figure 9**

# **Engineering Statement**

**In Support of a**

## **COUNTERPROPOSAL – MM Docket 98-198; RM-9304**

**First Broadcasting Management, LLC**

### **Stations included in Remaining Services Study for AD296C1 (KDXT.P)**

<b><u>Contour Number</u></b>	<b><u>Call Letters</u></b>	<b><u>City of License</u></b>	<b><u>Frequency</u></b>
1	KBWD-AM	Brownwood, Texas	1380
2	KLIF-AM	Dallas, Texas	570
3	KCOM-AM	Comanche, Texas	1550
4	KCLW-AM	Hamilton, Texas	900
5	KSTV-AM	Stephenville, Texas	1510
6	KPBC-AM	Garland, Texas	770
7	KAAM-AM	Plano, Texas	620
8	KSKY-AM	Balch Springs, Texas	660
9	KRLD-AM	Dallas, Texas	1080
10	KOOO-AM	Dallas, Texas	820
11	WBAP-AM	Fort Worth, Texas	820
12	KYXS-FM	Mineral Wells, Texas	95.9
13	KSTV-FM	Dublin, Texas	93.1
14	KCBI-FM	Dallas, Texas	90.9

**EXHIBIT E, FIGURE 10**

In Support of a  
**COUNTERPROPOSAL – MM Docket 98-198; RM-9304**  
 Muenster, Texas  
 Benbrook, Texas  
 Lone Grove, Oklahoma

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33 02 39 N.          Class C3          Search Date
98 46 27 W.          Current rules spacings      11-18-98

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KOLI.C	235C2	Electra	TX	350.1	117.04	117.0	0.04	*
KWRDFM	235C	Arlington	TX	106.6	176.37	176.0	0.37	*
KDGE	233C	Gainesville	TX	71.3	178.41	176.0	2.41	*
KDGE	233C	Gainesville	TX	71.3	178.41	176.0	2.41	*
AD237	237A	Jacksboro	TX	71.3	60.19	42.0	18.19	
DE236	236A	Eastland	TX	185.5	63.29	42.0	21.29	
ALOPEN	236A	Eastland	TX	185.5	63.29	42.0	21.29	
KIXYFM	234C1	San Angelo	TX	222.4	233.91	211.0	22.91	
KSEYFM	232A	Seymour	TX	322.6	77.22	42.0	35.22	
AD236	236C3	Baird	TX	219.0	92.54	43.0	49.54	

**EXHIBIT E, FIGURE 11**

